



Privacy Policy of Poly-clip System GmbH & Co. KG

The following Privacy Policy provides an overview of how your data is collected and processed.

Handling personal data responsibly is of utmost importance to us and we do so as a matter of course. Whenever we obtain, use or process personal data, we do so in compliance with the applicable national and European data protection laws. Personal data within the meaning of this policy is any information that may relate to you personally.

The following Privacy Policy provides an overview of how we process your personal data and your rights in this respect under data protection law.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller is:

Poly-clip System GmbH & Co. KG
Niedeckerstraße 1
65795 Hattersheim am Main, Germany

You can contact our Data Protection Officer at:

Poly-clip System GmbH & Co. KG
Data Protection Officer
Niedeckerstraße 1
65795 Hattersheim am Main, Germany
E-mail: datenschutz@polyclip.de

2. SOURCE OF PERSONAL DATA

We process personal data that we receive when we you visit our website or contact us.

3. CATEGORIES OF PERSONAL DATA THAT ARE PROCESSED

(1) When you visit our website for purely informational purposes, we do not collect any personal data except for the data transmitted by your browser to enable you to visit the website.

- Your IP address, with the last segment truncated.
- The remote host (name of the computer that requests the page), if transmitted by the network.
- Date, time, status, and volume of data transferred.
- The website from which you were referred to the requested website (referrer), if transmitted by the browser.
- Information about the browser product and version used (user-agent), if transmitted by the browser.
- If your user name should be transmitted by your network, it will not be stored by us.

This data will not be merged with any other data sources. Collection of this data is based on Art. 6 para. 1 sent. 1(f) GDPR. The website operator has a legitimate interest in the technically error-free presentation and optimisation of its website - for this purpose, server log files must be collected.

(2) In addition, your browser stores cookies. Cookies are small text files which are assigned to or stored on your device by the browser you are using and which provide the party that places the cookie (in this case, us) with certain information. Their purpose is to make the website generally more user-friendly and effective.

This website uses the following cookies:

- Transient cookies: These include, in particular, session cookies. These cookies store a session ID, which is used to assign various requests from your browser to the same session. Session cookies are deleted when you log out or close the browser.
- Persistent cookies: These cookies are automatically deleted after a preset period of time, which may vary depending on the cookie. You can delete these cookies in your browser's security settings at any time.

If information is stored on your device in this regard, it is required for technical reasons and is stored based on Section 25 para. 2 German Telecommunications and Telemedia Data Protection Act. The data is processed based on Art. 6 para. 1 sent. 1(a) or (f) GDPR.

(3) Besides using our website purely for informational purposes, we also offer a variety of services you can use if you are interested. To do this, you generally have to provide additional personal data, which we use to provide the respective service. This data is collected based on the legal basis stated for the respective service.

4. TRANSFER TO THIRD COUNTRIES

(1) Personal data is only transferred to countries outside the European Economic Area (EEA) if the requirements of Art. 44 et seq. GDPR are met. A third country means a country outside the European Economic Area (EEA) in which the GDPR is not directly applicable.

(2) The EU Commission has not issued an adequacy decision for the USA pursuant to Art. 45 para. 1 GDPR. This is because according to the European Court of Justice in its judgement of 17.07.2020 (case no. C-311/18, "Schrems II"), there is no level of data protection in the USA that would be comparable to that in the EU. If personal data is transferred to the USA, there is a risk that US American authorities could access the personal data under the surveillance programmes PRISM and UPSTREAM, which are based on Section 702 of the FISA (Foreign Intelligence Surveillance Act), and under Executive Order 12333 or the Presidential Police Directive 28. According to the European Court of Justice, EU citizens have no effective legal protection against such access in the USA or the EU.

(3) We only transfer your personal data to the USA or other third countries if either

- the recipient provides sufficient guarantees pursuant to Art. 46 GDPR for the protection of personal data - for example, the conclusion of standard contractual clauses between us and the recipient (Art. 46 para. 2(c) GDPR) or binding internal data protection regulations approved by the competent data



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protection authorities (Art. 46 para. 2(b) GDPR). In this way, the recipient assures that it will adequately protect the data and thus ensure a level of protection comparable to the GDPR.

- one of the exceptions listed in Art. 49 GDPR applies - for example, your express consent (Art. 49 para. 1(a) GDPR) - or
- if the transfer is necessary for the fulfilment of contractual obligations between you and us (Art. 49 para. 1(b) GDPR).

5. Contact form

If you contact us by e-mail or via the contact form, your e-mail address and, if you provide this information, your name, address and telephone number will be stored by us in order to answer your questions.

We collect, process, and use the data for the purposes of contract initiation and execution and to protect our legitimate business interests with regard to advising and supporting our customers and interested parties as well as designing products to meet their needs.

We use your data (company, name, address, product interest) to occasionally send you information about our products by post. You will only receive advertising by telephone or e-mail if you have given us your express consent to do so.

Processing of your personal data in connection with the contact form is based on consent in accordance with Art. 6 para. 1 sent. 1(a) GDPR.

6. USE OF GOOGLE reCAPTCHA

To protect your orders, we use the reCAPTCHA service of Google Inc. (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; hereinafter "Google"). The purpose of the query is to distinguish information entered by humans from misuse by automated machine processing. The query includes sending Google the IP address and potentially other data needed by Google for its reCAPTCHA service. To this end, your input is transferred to Google and subject to further processing there. However, if IP anonymisation is activated on this website, Google will truncate your IP address beforehand within Member States of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the United States and truncated there (for data transfer to the USA, see point 4). On behalf of the operator of this website, Google will use this information to analyse your use of this service. The IP address transmitted by your browser to reCAPTCHA during use thereof will not be merged with any other data from Google. This data is subject to Google's data protection regulations, which may be different.

The legal basis for processing the data is your consent according to Art. 6 para. 1 sent. 1(a) GDPR.

- [Overview of data protection](#)
- [Google Privacy Policy](#)

7. Google ANALYTICS

This website uses Google Universal Analytics with IP anonymisation, a web analysis service of Google Inc. (Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; hereinafter "Google"). Google Universal Analytics uses cookies. The information generated by the cookie about your use of this website will generally be transferred to a Google server in the USA and stored there. However, by activating IP anonymisation on this website, Google will truncate your IP address beforehand within Member States of the European Union or in other states party to the Agreement on the European Economic Area (for data transfer to the USA, see point 4). On behalf of the operator of this website, Google will use the information to analyse your use of the website, to prepare reports about website activities and to provide other services related to website and Internet use to the website operator.

The IP address transmitted by your browser in connection with Google Universal Analytics will not be merged with any other Google data.

The legal basis for processing the data is your consent according to Art. 6 para. 1 sent. 1(a) GDPR.

Besides the cookie settings on your browser, you can also prevent Google from collecting the data generated by the cookie about your use of the website (including your IP address) and prevent Google from processing this data by downloading and installing the browser plug-in available under this [link](#).

We would like to point out that on this website, Google Universal Analytics has been extended by the code "ga('set', 'anonymizelp', true);" in order to guarantee anonymous collection of IP addresses (known as IP masking). As a result, IP addresses are processed in truncated form, ruling out any possibility of direct association with a specific person.

We use Google Analytics in order to be able to analyse and regularly improve the use of our website. The statistics obtained allow us to improve our website and make it more interesting for you as a user.

- [Google Analytics Terms of Use](#)

- [Overview of data protection](#)

- [Google Privacy Policy](#)

8. Usercentrics CONSENT MANAGEMENT PLATFORM

We use the Usercentrics Consent Management Platform (Usercentrics) of Usercentrics GmbH, Rosental 4, 80331 Munich, Germany. Usercentrics collects log file data and consent data using JavaScript. JavaScript enables us to inform users about their consent to certain cookies and other technologies on our website and to obtain, manage, and document this consent.

The data is deleted as soon as it is no longer required for our logging purposes.

You can permanently prevent the execution of JavaScript at any time by selecting the appropriate settings in your browser, which would also prevent Usercentrics from executing JavaScript.



- [Usercentrics Privacy Policy](#)

9. INTEGRATION OF YOUTUBE VIDEOS

We have integrated YouTube videos into our website, which are stored at <http://www.YouTube.com> and can be played directly from our website. They are all integrated in "extended data protection mode", which means that no data about you as a user will be transferred to YouTube if you do not play the videos.

Only once you play a video will the data listed below be transferred. We have no influence over this data transfer. The data processing is based on Art. 6 para. 1 sent. 1(a) GDPR.

Through your visit to the website, YouTube - a service of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001) - receives the information that you have called up the relevant sub-page of our website. This happens regardless of whether YouTube provides a user account through which you are logged in or no account exists. If you are logged in to Google, your data will be assigned directly to your account. If you do not want data to be assigned to your YouTube profile, you must log out before activating the button. YouTube stores your data as usage profiles and uses it for the purposes of advertising, market research and/or demand-oriented design of its website. Such an analysis is performed in particular (even for users who are not logged in) to provide demand-oriented advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles; you must contact YouTube to exercise this right. Google also processes your personal data in the USA (see point 4 regarding data transfer to the USA).

- [Google Privacy Policy](#)

10. Using OUR B2B WEBSHOP

We offer you the opportunity to order various machines and products via our B2B webshop. To do this, Poly-clip System creates a user account for you which stores all your customer data already held by Poly-clip System (e.g. company, name of the ordering employee, e-mail address, delivery address). Poly-clip System processes this data in order to process your order and the associated contracts. The legal basis for processing the data is Art. 6 para. 1 sent. 1(b) GDPR.

We also provide you with individual offers from our webshop in your user account.

In order to log into the Poly-clip System webshop, all you will need is your e-mail address that is stored in our system and the individual password we generated for you. You can change this password after your first login.

11. Newsletter DELIVERY

We use the double opt-in procedure to register for our newsletter. This means that after you have provided us with your e-mail address, we will send you a confirmation e-mail to the e-mail address you provided in which we ask you to confirm that you wish to



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receive the newsletter. The processing of your personal data in connection with the newsletter is based on Art. 6 para. 1 sent. 1(a) GDPR.

You may revoke your consent to receive the newsletter at any time. You can revoke your consent by clicking on the link provided in every newsletter e-mail, by sending an e-mail to online.information@polyclip.com or by sending a message to: Poly-clip System GmbH & Co. KG, Academy and Communication, Niedeckerstraße 1, 65795 Hattersheim am Main, Germany, Tel.: +49 6190 8886-931, Fax.: +49 6190 8886-15931.

12. PURPOSES FOR PROCESSING PERSONAL DATA AND LEGAL BASES FOR PROCESSING

We process your personal data in compliance with the applicable national and European legal data protection requirements. In this respect, the processing is lawful if at least one of the following conditions is met:

a. Consent (Art. 6 para. 1 sent. 1(a) GDPR)

If you have consented to the processing of your personal data for certain purposes (e.g. use of data for marketing purposes, cookie use, newsletter, contact form), then this processing is lawful on the basis of your consent. Consent given may be revoked at any time with future effect.

b. To fulfil contractual obligations or precontractual measures (Art. 6 para. 1 sent. 1(b) GDPR)

In order to meet our contractual obligations in individual cases or to carry out pre-contractual measures, implemented on request, we process personal data to fulfil the contract. The purposes of data processing primarily depend on the specific contractual relationship and may include, but are not limited to, analysing requirements and providing advice. Further details about the purposes of data processing can be found in the contract documentation and our General Terms and Conditions.

c. Due to legal requirements (Art. 6 para. 1 sent. 1(c) GDPR)

Poly-clip is subject to various legal obligations (retention requirements under commercial and tax law in accordance with the German Commercial Code and the German Tax Code). The processing purposes include, but are not limited to, the fulfilment of tax inspection and reporting requirements and also risk analysis and control in the company and within the group.

d. Within the framework of the balancing of interests (Art. 6 para. 1, sent. 1(f) GDPR)

Where necessary, we process your data beyond actual fulfilment of the contract in order to protect our legitimate interests or those of third parties. Examples:

- Revision and improvement of procedures for general business management and further development of products and services,
- Advertising, customer satisfaction, unless you have objected to such use of your data,
- Assertion of legal claims and defence in legal disputes,
- Prevention, investigation or determent of criminal offences.



13. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

We have some of the aforementioned processes and services carried out by carefully selected service providers who comply with data protection requirements. The external service providers are bound by our instructions and are checked regularly. They will not share your data with third parties.

With respect to sharing data with other recipients, we only share information about you if required to do so by law, if you have consented or if we are authorised to share it. Provided these requirements are met, recipients of personal data may include, but are not limited to,:

- Public authorities and institutions (e.g. financial authorities, law enforcement authorities) if there is a legal or official obligation
- Other companies or comparable institutions to which we transfer personal data in order to conduct the business relationship with you (e.g. network operators, credit agencies)
- Other companies within the group (e.g. to process payment transactions or to control risk due to legal obligations).

14. INTENT TO TRANSFER PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATION

Active transfer of personal data to a third country or to an international organisation only takes place if it has been expressly referred to within the context of the aforementioned services.

15. CRITERIA FOR DETERMINING THE DURATION OF STORAGE OF PERSONAL DATA

The criteria for determining the duration of storage include the purpose of storage coming to an end and any subsequent statutory retention period. If the data is no longer needed for meeting contractual or legal obligations, it is regularly deleted, unless its - temporary and, where appropriate, limited - further processing is necessary for the following purposes:

- Fulfilment of retention obligations under commercial and tax law: This includes the German Commercial Code (HGB) and the German Tax Code (AO). They specify retention and documentation periods of up to 10 years.
- Preservation of evidence within the legal statute of limitations: According to Section 195 et seq. of the German Civil Code (BGB), the regular limitation period is 3 years, but under special circumstances can be up to 30 years.

16. DATA PROTECTION RIGHTS

You may at any time request information about the personal data we hold on you as well as the purpose and origin thereof. In addition, you may also have your personal data blocked, corrected or deleted at any time. Requests for information about your personal data and requests for correction, blocking or deletion thereof should be sent to:



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Poly-clip System GmbH & Co. KG, Academy and Communication, Niedeckerstraße 1, 65795 Hattersheim am Main, Germany, Tel.: +49 6190 8886-931, Fax.: +49 6190 8886-15931, E-mail: online.information@polyclip.com. All requests for information, correction, blocking and deletion, as well as the revocation of consent to data collection, usage or processing must be sent to this office. You also have the right to lodge a complaint with the data protection supervisory authorities.

You can revoke your consent to the processing of your personal data at any time with effect for the future. The same also applies to revocation of any declarations of consent that were provided before the GDPR came into force, i.e. before 25 May 2018.

You have the right to submit an objection, for reasons related to your specific situation, at any time against the processing of personal data related to you that takes place based on Art. 6 para. 1 sent. 1(e) GDPR (data processing in the public interest) and Art. 6 para. 1 sent. 1(f) GDPR (data processing based on balancing of interests); this also applies to profiling based on this provision within the meaning of Art. 4 No. 4 GDPR.

In some cases, we process your personal data for direct advertising purposes. You have the right to object to the processing of your personal data for direct advertising purposes at any time; the same applies to profiling insofar as it is connected with such direct advertising.

If you object to the processing of your personal data for direct advertising purposes, your personal data will no longer be processed for this purpose.

If you submit an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or unless the processing is required for the assertion, exercise or defence of legal claims.

The objection can be made informally and directed to the contacts indicated above.

17. OBLIGATION TO PROVIDE DATA AND POSSIBLE CONSEQUENCES OF NOT PROVIDING IT

Within the context of our business relationship, you are required to provide the personal data necessary to initiate and conduct a business relationship and to fulfil the contractual obligations associated therewith, as well as the personal data we are required to collect by law. Without this data, we are generally not in a position to conclude the contract with you or to execute it.

18. EXISTENCE OF AUTOMATED DECISION-MAKING INCLUDING PROFILING

Essentially, we never use automatic decision-making pursuant to Article 22 of the GDPR to initiate and conduct the business relationship. If we use these procedures in individual cases, we will inform you about this separately if required to do so by law.

19. DATA SECURITY

We protect your information using modern security systems and comply with data protection and security regulations within the framework of the GDPR.



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We maintain up-to-date technical measures to ensure data security, especially in relation to protecting your personal data against risks during data transmission and unintended disclosure to third parties. These measures are updated constantly in line with the current state of the art.

Online forms on our website are sent with SSL encryption to protect the data you enter. Nevertheless, we cannot guarantee that the information sent cannot be viewed by third parties during transmission. Therefore, you should never send passwords, credit card numbers or other information that you wish to keep secret.